

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS

TIMOTHY OWENS and SHELLEY OWENS,     )  
   )  
          Plaintiff,                                     )  
   )  
v.   ) CASE NO.: 16-CV-01009-JPG-RJD  
   )  
PRAIRIE STATE GENERATING COMPANY     )  
   )  
          Defendant.                                   )

**ANSWER TO COUNTERCLAIM AGAINST TIMOTHY OWENS**

The Counter-Defendant, Timothy Owens, by his attorney, Greg Roosevelt, answers the counterclaim as follows:

**Parties, Jurisdiction and Venue**

1. Counter-Defendant admits the allegations of Paragraph 1.
2. Counter-Defendant admits the allegations of Paragraph 2.
3. Counter-Defendant admits the allegations of Paragraph 3.
4. Counter-Defendant admits the allegations of Paragraph 4.
5. Counter-Defendant admits the allegations of Paragraph 5.

WHEREFORE, Counter-Defendant respectfully requests that this Court deny the relief sought.

**Facts Common to All Counts**

6. Counter-Defendant denies only that his discharge was on October 31, 2014.
7. Counter-Defendant admits the allegations of Paragraph 7.
8. Counter-Defendant admits the allegations of Paragraph 8 in part but denies that leases and security deposits were always the practice.
9. Counter-Defendant denies the allegations of Paragraph 9.
10. Counter-Defendant denies the allegations of Paragraph 10.

11. Counter-Defendant denies the allegations of Paragraph 11.
12. Counter-Defendant denies the allegations of Paragraph 12.
13. Counter-Defendant denies the allegations of Paragraph 13.
14. Counter-Defendant denies the allegations of Paragraph 14.
15. Counter-Defendant denies the allegations of Paragraph 15.
16. Counter-Defendant denies the allegations of Paragraph 16.
17. Counter-Defendant denies the allegations of Paragraph 17.
18. Counter-Defendant denies the allegations of Paragraph 18.
19. Counter-Defendant denies the allegations of Paragraph 19.
20. Counter-Defendant denies the allegations of Paragraph 20.
21. Counter-Defendant denies the allegations of Paragraph 21.
22. Counter-Defendant denies the allegations of Paragraph 22.
23. Counter-Defendant denies the allegations of Paragraph 23.
24. Counter-Defendant denies the allegations of Paragraph 24.
25. Counter-Defendant denies the allegations of Paragraph 25.
26. Counter-Defendant denies the allegations of Paragraph 26.
27. Counter-Defendant denies the allegations of Paragraph 27.
28. Counter-Defendant denies the allegations of Paragraph 28.
29. Counter-Defendant denies the allegations of Paragraph 29.
30. Counter-Defendant denies the allegations of Paragraph 30.
31. Counter-Defendant denies the allegations of Paragraph 31.
32. Counter-Defendant denies the allegations of Paragraph 32.

WHEREFORE, Counter-Defendant respectfully requests that this Court deny the relief sought.

**Count I**  
**Breach of Fiduciary Duty**

- 33. Counter-Defendant denies the allegations of Paragraph 33.
- 34. Counter-Defendant denies the allegations of Paragraph 34.
- 35. Counter-Defendant denies the allegations of Paragraph 35.
- 36. Counter-Defendant denies the allegations of Paragraph 36.
- 37. Counter-Defendant denies the allegations of Paragraph 37.
- 38. Counter-Defendant denies the allegations of Paragraph 38.
- 39. Counter-Defendant denies the allegations of Paragraph 39.
- 40. Counter-Defendant denies the allegations of Paragraph 40.
- 41. Counter-Defendant denies the allegations of Paragraph 41.

WHEREFORE, Counter-Defendant respectfully requests that this Court deny the relief sought.

**Count II**  
**Conversion**

- 42. Counter-Defendant denies the allegations of Paragraph 42.
- 43. Counter-Defendant denies the allegations of Paragraph 43.
- 44. Counter-Defendant denies the allegations of Paragraph 44.
- 45. Counter-Defendant denies the allegations of Paragraph 45.

WHEREFORE, Counter-Defendant respectfully requests that this Court deny the relief sought.

**Count III**  
**Unjust Enrichment**

- 46. Counter-Defendant denies the allegations of Paragraph 46.
- 47. Counter-Defendant denies the allegations of Paragraph 47.
- 48. Counter-Defendant denies the allegations of Paragraph 48.

49. Counter-Defendant denies the allegations of Paragraph 49.

50. Counter-Defendant denies the allegations of Paragraph 50.

WHEREFORE, Counter-Defendant respectfully requests that this Court deny the relief sought.

Respectfully submitted,

/s/Greg Roosevelt

Greg Roosevelt, #02375427

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**CERTIFICATE OF SERVICE**

I hereby certify that **Answer to Counterclaim Against Timothy Owens** was sent via the CM/ECF system to the following on the 26<sup>th</sup> day of April, 2017.

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